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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

1 WARREN H. NELSON, JR. #104744
2 A PROFESSIONAL CORPORATION
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4 San Diego, CA 92115
5 Telephone: (619) 269 4212
6 Facsimile: (619) 501 7948

7 Attorney for Defendant
8 STANDARD INSURANCE COMPANY

BY:

DEPUTY

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA

11 LAURIE ORANGE

12 vs.

13 STANDARD INSURANCE
14 COMPANY, a corporation; and DOES
15 1, through 10, inclusive,

16 Defendants.
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Case No.: '08 CV 686 BTM CAB

DECLARATION OF REBECCA J.
JEFFREY IN SUPPORT OF
DEFENDANT STANDARD
INSURANCE COMPANY'S NOTICE
OF REMOVAL

20
21 I, Rebecca J. Jeffrey, hereby declare as follows:

22 1. I am over 18 years of age and I am a resident of the State of
23 Washington. My employment address is 900 S.W. Fifth Avenue, Portland, Oregon
24 97204.

25 2. I have personal knowledge of the facts set forth in this Declaration
26 and, if called as a witness, could and would testify competently to such facts under
27 oath except for those facts identified below as being based on information and
28 belief. For the facts based on information and belief, as part of my job duties I

1 gathered information from individuals within the company with such knowledge. I
 2 completed gathering information updated through the end of December 31, 2007,
 3 which is set forth below, on or about April 1, 2008. Based on my investigation, I
 4 believe the facts stated below to be true and correct.

5 3. I have been an employee of defendant Standard Insurance Company
 6 ("Standard") since June 3, 2005. My current position/title is Senior Paralegal.

7 4. Standard is an Oregon corporation, organized and existing under the
 8 laws of the State of Oregon, with its principal place of business in Portland,
 9 Oregon.

10 5. Standard is licensed to conduct business in 49 of the 50 United States,
 11 the District of Columbia, Guam, and the US Virgin Islands.

12 6. Based on information and belief, as of December 31, 2007, the
 13 approximate percentage of revenue generated by Standard per capita in each state
 14 in which it does business is as follows:

16	•	Alabama	1.02%
17	•	Alaska	0.41%
18	•	Arizona	2.97%
19	•	Arkansas	0.33%
20	•	California	14.99%
21	•	Colorado	5.18%
22	•	Connecticut	0.92%
23	•	Delaware	0.14%
24	•	District of Columbia	0.48%
25	•	Florida	5.23%
26	•	Georgia	2.80%
27	•	Hawaii	0.30%
28			

1	•	Idaho	1.18%
2	•	Illinois	2.14%
3	•	Indiana	2.34%
4	•	Iowa	0.86%
5	•	Kansas	1.09%
6	•	Kentucky	1.29%
7	•	Louisiana	1.36%
8	•	Maine	0.25%
9	•	Maryland	1.07%
10	•	Massachusetts	2.25%
11	•	Michigan	1.52%
12	•	Minnesota	1.72%
13	•	Mississippi	0.26%
14	•	Missouri	3.12%
15	•	Montana	0.33%
16	•	Nebraska	0.26%
17	•	Nevada	0.75%
18	•	New Hampshire	0.37%
19	•	New Jersey	1.09%
20	•	New Mexico	0.53%
21	•	New York	0.17%
22	•	North Carolina	1.48%
23	•	North Dakota	0.19%
24	•	Ohio	2.98%
25	•	Oklahoma	1.42%
26	•	Oregon	9.98%

1	•	Pennsylvania	2.22%
2	•	Rhode Island	0.18%
3	•	South Carolina	0.96%
4	•	South Dakota	0.06%
5	•	Tennessee	0.96%
6	•	Texas	9.31%
7	•	Utah	1.23%
8	•	Vermont	0.21%
9	•	Virginia	1.21%
10	•	Washington	7.62%
11	•	West Virginia	0.18%
12	•	Wisconsin	0.84%
13	•	Wyoming	0.10%

15 7. Standard's executive and administrative functions are located at its
16 headquarters in Oregon. The headquarters in Oregon contain the entire finance,
17 accounting, purchasing, treasury, marketing, information systems, internal audit,
18 and legal departments and conducts most of the administrative, training, claims
19 processing/handling, and human resources functions. Oregon is the base from
20 which strategies, procedures, and marketing to obtain all of the income described
21 above is determined.

22 8. Based on information and belief, as of March 28, 2008, Standard
23 employs 3,498 people in 34 states. 2,428 of the employees, or 69.4%, are
24 employed in Oregon.

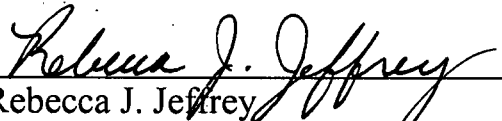
25 9. Based on information and belief, as of December 31, 2007, Standard
26 owns real property with a total book value of \$40,997,831. Of this total, \$426,811
27 is located in Georgia; the remainder is located in Oregon.
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1 10. Based on information and belief, as of December 31, 2007, Standard
2 owns computer hardware, artwork, copiers, furniture, personal computers,
3 telephones, and other office equipment (hereinafter "Personal Property") purchased
4 at a total cost of \$58,702,351. Ninety percent (90%) of that Personal Property, or
5 \$53,034,540, is located in Oregon.

6 11. The location of Defendant's principal point of contact for dealing with
7 the public is Portland, Oregon. Standard's Public Affairs and Communications
8 departments are located at its headquarters in Portland, Oregon.

9 I declare under penalty of perjury under the laws of Oregon, California and
10 the United States of America that the foregoing is true and correct.

11 Executed this 9th day of April, 2008, in Portland, Oregon.

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15 Rebecca J. Jeffrey
16 Senior Paralegal for Defendant
17 Standard Insurance Company
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DOCKET No. UNASSIGNED

Orange v. Standard Insurance Company, et al.

PROOF OF SERVICE BY MAIL

I, Warren H. Nelson, Jr., the undersigned, hereby certify and declare under penalty of perjury that I am over the age of 18 years and am not a party to this action.

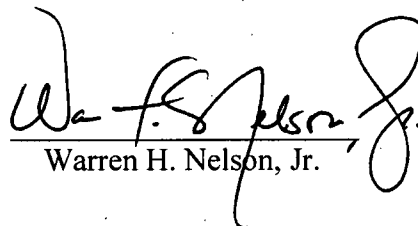
My business address is Warren H. Nelson, Jr., A Professional Corporation, 6161 El Cajon Blvd., # 273, San Diego, CA 92115, telephone (619) 269-4212, facsimile (619) 501-7948. On the 15th day of April 2008, I served a true copy of the foregoing document titled exactly:

**DECLARATION OF REBECCA J. JEFFREY IN SUPPORT OF
DEFENDANT STANDARD INSURANCE COMPANY'S NOTICE OF
REMOVAL**

By placing it/ in an addressed sealed envelope with correct postage affixed thereto and personally depositing it in the United States mail. I addressed the mailing envelope to the following:

Robert K. Scott, Esq.
D. Scott Mohny, Esq.
Law Offices of Robert K. Scott
7700 Irvine Center Drive, Suite 605
Irvine, CA 92618

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of April 2008 at San Diego, California.


Warren H. Nelson, Jr.